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CLERK U.S. DISTRICT COURT  
CENTRAL DIST. OF CALIF.  
LOS ANGELES

FILED

UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

January 2015 Grand Jury

UNITED STATES OF AMERICA,

CR No. 15-00131 (A) -JFW

Plaintiff,

F I R S T  
S U P E R S E C O N D  
I N D I C T M E N T

v.

TEOFIL BRANK,  
aka "Jarec Wentworth,"  
aka "@JarecWentworth,"

[18 U.S.C. § 875 (d) : Transmitting  
Threatening Communications with  
Intent to Extort; 18 U.S.C.  
§ 1951(a) : Extortion and  
Attempted Extortion Affecting  
Interstate Commerce By Nonviolent  
Threat; 18 U.S.C. § 880: Receiving  
Proceeds of Extortion;  
18 U.S.C. § 1952(a) (3) : Use of an  
Interstate Facility to Facilitate  
an Unlawful Activity; 18 U.S.C.  
§ 924(c) (1) (A) (i) : Possession of a  
Firearm in Furtherance of a Crime  
of Violence; 18 U.S.C.  
§ 981(a) (1) (C) , 28 U.S.C.  
§ 2461(c) , 21 U.S.C. § 853:  
Criminal Forfeiture]

Defendant.

The Grand Jury charges:

COUNT ONE

[18 U.S.C. § 875 (d) ]

On or about February 16, 2015, in Los Angeles County, within the  
Central District of California, and elsewhere, defendant TEOFIL

1 BRANK, also known as ("aka") "Jarec Wentworth," aka "@JarecWentworth"  
2 ("BRANK"), with the intent to extort money and things of value from  
3 victim D.B., knowingly transmitted in interstate or foreign commerce  
4 telephone communications and electronic text communications that  
5 contained a true threat to injure the reputation of victim D.B., that  
6 is, defendant BRANK threatened to distribute sensitive information  
7 about victim D.B. on social media, if victim D.B. refused to transfer  
8 money, a motorcycle, and the title to victim D.B.'s automobile to  
9 defendant BRANK.

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1 COUNT TWO

2 [18 U.S.C. § 1951(a)]

3 On or about February 17, 2015, in Los Angeles County, within the  
4 Central District of California, and elsewhere, defendant TEOFIL  
5 BRANK, also known as ("aka") "Jarec Wentworth," aka "@JarecWentworth"  
6 ("BRANK"), knowingly and with the intent to obtain property,  
7 obstructed, delayed, and affected commerce and the movement of  
8 articles and commodities in commerce, by extortion, as those terms  
9 are defined in Title 18, United States Code, Section 1951, in that  
10 defendant BRANK knowingly obtained personal property consisting of at  
11 least \$500,000 from victim D.B., with victim D.B.'s consent, induced  
12 by the wrongful use of fear, by threatening to distribute sensitive  
13 information about victim D.B. on social media, if victim D.B. refused  
14 to transfer money, a motorcycle, and the title to victim D.B.'s  
15 automobile to defendant BRANK.

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1 COUNT THREE

2 [18 U.S.C. § 880]

3 On or about February 16, 2015, in Los Angeles County, within the  
4 Central District of California, and elsewhere, defendant TEOFIL  
5 BRANK, also known as ("aka") "Jarec Wentworth," aka  
6 "@JarecWentworth," received, possessed, concealed, and disposed of a  
7 vehicle that was obtained from the transmission in interstate  
8 commerce of a communication that contained a threat to injure the  
9 reputation of victim D.B., in violation of Title 18, United States  
10 Code, Section 875(d), knowing the same to have been unlawfully  
11 obtained.

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1 COUNT FOUR

2 [18 U.S.C. § 880]

3 On or about February 17, 2015, in Los Angeles County, within the  
4 Central District of California, and elsewhere, defendant TEOFIL  
5 BRANK, also known as ("aka") "Jarec Wentworth," aka  
6 "@JarecWentworth," received, possessed, concealed, and disposed of  
7 money that was obtained from the transmission in interstate commerce  
8 of a communication that contained a threat to injure the reputation  
9 of victim D.B., in violation of Title 18, United States Code, Section  
10 875(d), knowing the same to have been unlawfully obtained.

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1 COUNT FIVE

2 [18 U.S.C. § 1951(a)]

3 On or about March 3, 2015, in Los Angeles County, within the  
4 Central District of California, and elsewhere, defendants TEOFIL  
5 BRANK, also known as ("aka") "Jarec Wentworth," aka "@JarecWentworth"  
6 ("BRANK"), knowingly and with the intent to obtain property,  
7 attempted to obstruct, delay, and affect commerce and the movement of  
8 articles and commodities in commerce by extortion, as those terms are  
9 defined in Title 18, United States Code, Section 1951, in that  
10 defendant BRANK knowingly attempted to obtain personal property  
11 consisting of at least \$1,000,000 from victim D.B. with victim D.B.'s  
12 consent, induced by the wrongful use of fear, by threatening to  
13 distribute sensitive information about victim D.B. on social media,  
14 if victim D.B. refused to transfer money, a motorcycle, and the title  
15 to victim D.B.'s automobile to defendant BRANK.

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1 COUNT SIX

2 [18 U.S.C. § 1952(a)(3)]

3 On or about March 3, 2015, in Los Angeles County, within the  
4 Central District of California, and elsewhere, defendant TEOFIL  
5 BRANK, also known as ("aka") "Jarec Wentworth," aka  
6 "@JarecWentworth," used a facility of interstate or foreign commerce,  
7 namely a cellular telephone, with the intent to promote, manage,  
8 establish, carry on, and facilitate the promotion, management,  
9 establishment, and carrying on of an unlawful activity, namely,  
10 extortion offenses in violation of the laws of the State of  
11 California and of the United States, and thereafter attempted to  
12 perform acts to promote, manage, establish, carry on, and facilitate  
13 the promotion, management, establishment, and carrying on of, the  
14 extortion.

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1 COUNT SEVEN

2 [18 U.S.C. § 924(c)(1)(A)(i)]

3 On or about March 4, 2015, in Los Angeles County, within the  
4 Central District of California, defendant TEOFIL BRANK, also known as  
5 ("aka") "Jarec Wentworth," aka "@JarecWentworth," knowingly possessed  
6 a firearm, namely, a .357 caliber Colt Python revolver, bearing  
7 serial number K46715, in furtherance of a crime of violence, namely,  
8 attempted extortion affecting interstate commerce, in violation of  
9 Title 18, United States Code, Section 1951(a), as charged in Count  
10 Five of this Indictment.

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1 FORFEITURE ALLEGATION

2 [18 U.S.C. § 981(a)(1)(C); 28 U.S.C. § 2461(c); 21 U.S.C. § 853]

3 Pursuant to Federal Rule of Criminal Procedure 32.2, notice is  
4 hereby given to defendant TEOFIL BRANK ("BRANK") that the United  
5 States will seek forfeiture as part of any sentence in accordance  
6 with Title 18, United States Code, Section 981(a)(1)(C), Title 28,  
7 United States Code, Section 2461(c) and Title 21, United States Code,  
8 Section 853 in the event of defendant's conviction under Counts One  
9 and Two of this Indictment.

10 Defendant BRANK shall forfeit to the United States the following  
11 property:

12 a. All right, title, and interest in any and all  
13 property, real or personal, which constitutes or is derived from  
14 proceeds traceable to any offense set forth in Counts One and Two of  
15 this Indictment, including, but not limited to \$500,000.00 that was  
16 wire transferred to defendant BRANK by victim D.B. on or about  
17 February 17, 2015; and

18 b. A sum of money equal to the total value of the  
19 property described in subsection (a) above.

20 Pursuant to Title 21, United States Code, Section 853(p), as  
21 incorporated by Title 28, United States Code, Section 2461(c) and  
22 Title 18, United States Code, Section 982(b), defendant BRANK shall  
23 forfeit substitute property, up to the total value of the property  
24 described in the preceding paragraph, if, as a result of any act or  
25 omission of a defendant, the property described in the preceding  
26 paragraph, or any portion thereof (a) cannot be located upon the  
27 exercise of due diligence; (b) has been transferred or sold to, or  
28 deposited with a third party; (c) has been placed beyond the

1 jurisdiction of the court; (d) has been substantially diminished in  
2 value; or (e) has been commingled with other property that cannot be  
3 divided without difficulty.

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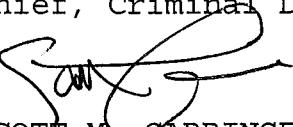
5 A TRUE BILL

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7 151  
8 Foreperson

9 STEPHANIE YONEKURA  
10 Acting United States Attorney

11 ROBERT E. DUGDALE  
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24 KIMBERLY D. JAIMEZ  
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